

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Sam Wolk,

Case No. 22-cv-01666 (WMW/DTS)

Plaintiff,

vs.

City of Brooklyn Center, et al.,

Defendants.

**DECLARATION OF SARAH  
McLAREN IN SUPPORT OF  
HENNEPIN COUNTY AND  
HENNEPIN COUNTY SHERIFF  
DAVID HUTCHINSON’S MOTION  
TO DISMISS**

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I, Sarah McLaren, state and affirm as follows:

1. I am an Assistant County Attorney for Hennepin County.
2. In that capacity, I am one of the attorneys representing Hennepin County and Hennepin County Sheriff David Hutchinson (“Sheriff Hutchinson”) in the above-entitled action.
3. I am also one of the attorneys representing Sheriff Hutchinson in the civil action *Goyette, et al. v. City of Minneapolis, et al.*, Court File No. 20-cv-1302 (WMW/DTS) (“*Goyette* action”).
4. Sheriff Hutchinson was not a party to the *Goyette* action until the *Goyette* plaintiffs filed their Third Amended Complaint on September 28, 2021, naming Sheriff Hutchinson as a defendant in his individual and official capacity. A true and correct copy of the public version of the Third Amended Complaint (with confidential information redacted), is attached hereto as Exhibit 1. Hennepin County has never been

a party to the *Goyette* action.

5. The *Goyette* plaintiffs have chosen not to move for class certification against Sheriff Hutchinson and have stipulated that they will not seek to do so absent some future amendment to the pleadings. A true and correct copy of this stipulation is attached hereto as Exhibit 2.

6. Hennepin County, the Hennepin County Sheriff's Office, and Sheriff Hutchinson are not parties to the civil actions *Samaha, et al. v. City of Minneapolis, et al.*, File No. 20-cv-01715 (D. Minn.), and *Armstrong, et al. v. City of Minneapolis, et al.*, File No. 20-cv-01645 (D. Minn.).

7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date September 12, 2022.

/s/ Sarah McLaren  
Sarah McLaren